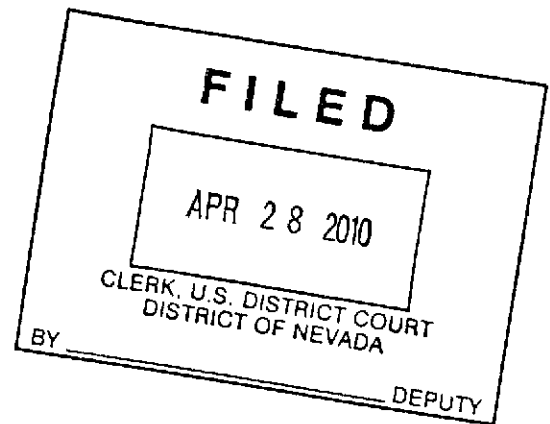


1 DANIEL G. BOGDEN
United States Attorney
2 KATHRYN C. NEWMAN
Assistant United States Attorney
3 333 Las Vegas Blvd. South, Suite 5000
Las Vegas, Nevada 89101
4 Phone: (702) 388-6336 / Fax: (702) 388-5087



5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 -oOo-

9 UNITED STATES OF AMERICA,

10 PLAINTIFF,

11 vs.

12 STACY JOHNSON,

13 DEFENDANT.

CRIMINAL INDICTMENT

2:10-CR- 190

VIOLATIONS:

29 U.S.C. § 501(c) - Embezzlement from Union
29 U.S.C. § 439(c) - Falsifying Union Records

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16 **THE GRAND JURY CHARGES THAT:**

17 At all times material to this Indictment, the Laborers' International Union of
18 North America, Local 872 ("the Union"), was a labor organization engaged in an industry
19 affecting commerce, subject to the Labor Management Reporting and Disclosure Act of
20 1959, 29 U.S.C. § 401, *et seq.*, and required to file an annual financial report with the
21 Secretary of Labor.

22 **COUNT ONE**
23 **Embezzlement From Union**

24 From in or about June 2006 to in or about April 2009, in the State and
25 Federal District of Nevada,

26 **STACY JOHNSON,**

1 defendant herein, while a person employed directly by the Union, did embezzle, steal and
2 unlawfully and willfully abstract and convert to her own use the moneys and funds of the
3 Union, that is, she stole approximately \$45,500 in membership dues and initiation fees
4 paid by union members on approximately 96 different occasions while employed as a
5 cashier for the Union.

6 All in violation of Title 29, United States Code, Section 501(c).

7 **COUNT TWO**

8 Falsification of Financial Records Required
9 To Be Kept by Labor Union
(2006)

10 From on or about June 12, 2006, to on or about December 31, 2006, in the
11 State and Federal District of Nevada,

12 **STACY JOHNSON,**

13 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record
14 required to be kept by Title 29, United States Code, Section 436, that is, records and
15 receipts relating to membership dues and deposits, which are matters required to be
16 reported in the annual financial report of the Union that is filed with the Secretary of Labor
17 for the Union's fiscal year ending on December 31, 2006.

18 All in violation of Title 29, United States Code, Section 439(c).

19 **COUNT THREE**

20 Falsification of Financial Records Required
21 To Be Kept by Labor Union
(2007)

22 From on or about January 1, 2007, to in or about December 31, 2007, in the
23 State and Federal District of Nevada,

24 **STACY JOHNSON,**

25 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record
26

1 required to be kept by Title 29, United States Code, Section 436, that is, records and
2 receipts relating to membership dues and deposits, which are matters required to be
3 reported in the annual financial report of the Union that is filed with the Secretary of Labor
4 for the Union's fiscal year ending on December 31, 2007.

5 All in violation of Title 29, United States Code, Section 439(c).

6 **COUNT FOUR**

7 Falsification of Financial Records Required
8 To Be Kept by Labor Union
9 (2008)

10 From on or about January 1, 2008, to in or about December 31, 2008, in the
11 State and Federal District of Nevada,

12 **STACY JOHNSON,**

13 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record
14 required to be kept by Title 29, United States Code, Section 436 , that is, records and
15 receipts relating to membership dues and deposits, which are matters required to be
16 reported in the annual financial report of the Union that is filed with the Secretary of Labor
17 for the Union's fiscal year ending on December 31, 2008.

18 All in violation of Title 29, United States Code, Section 439(c).

19 **COUNT FIVE**

20 Falsification of Financial Records Required
21 To Be Kept by Labor Union
22 (2009)

23 From on or about January 1, 2009, to in or about April 10, 2009, in the State
24 and Federal District of Nevada,

25 **STACY JOHNSON,**

26 defendant herein, did willfully make a false entry in, conceal, withhold and destroy a record
required to be kept by Title 29, United States Code, Section 436, that is, records and

1 receipts relating to membership dues and deposits, which are matters required to be
2 reported in the annual financial report of the Union that is filed with the Secretary of Labor
3 for the Union's fiscal year ending on December 31, 2009.

4 All in violation of Title 29, United States Code, Section 439(c).

5 DATED: this 28 day of April 2010.

6 A TRUE BILL:

7
8 /S/
FOREPERSON OF THE GRAND JURY

9 DANIEL G. BOGDEN
10 United States Attorney

11 
12 KATHRYN C. NEWMAN
13 Assistant United States Attorney
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